

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHRISTOPHER C. COLTON and : CHAPTER 13
PATTY J. COLTON :
Debtor(s) :
 :
CHARLES J. DEHART, III :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
CHRISTOPHER C. COLTON and :
PATTY J COLTON :
Respondent(s) : CASE NO. 1-21-bk-00223

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 20th day of April, 2021, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s)

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
 - a. Secured claims not in plan. (Shellpoint) (Should be provided for in §2C of plan.)
 - b. The plan is underfunded relative to claims to be paid. (Must include Trustee commission of 9%.)
 - c. Debtors have not served the Amended Plan upon interested parties.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/James K. Jones
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 20th day of April, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Christopher Colton and
Patty J. Colton
233 Troy Road
Dallastown, PA 17313

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee